



Commonwealth of Massachusetts  
**DEPARTMENT OF HOUSING &  
COMMUNITY DEVELOPMENT**

Deval L. Patrick, Governor ♦ Timothy P. Murray, Lt. Governor ♦ Tina Brooks, Undersecretary

**DRAFT**

COMMONWEALTH OF MASSACHUSETTS

COMMUNITY SERVICES BLOCK GRANT (CSBG)

STATE PLAN AND APPLICATION  
FEDERAL FISCAL YEARS  
2009 – 2010

ADMINISTERED BY

*COMMUNITY SERVICES UNIT  
DIVISION OF COMMUNITY SERVICES*

FUNDED BY

*THE U. S. DEPARTMENT OF HEALTH AND HUMAN RESOURCES*

*SEPTEMBER 2008*

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## FISCAL YEAR 2009 – 2010 CSBG STATE PLAN

### **I. Federal Fiscal Years covered by this State Plan and Application**

The Commonwealth's FY 2009-2010 Community Services Block Grant State Plan describes how the Community Services Block Grant (CSBG) program operates within Massachusetts. The Plan sets forth how the state collects and analyzes client information, outcomes, and assists in determining local service delivery, program needs, and priorities.

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### II. Letter of Transmittal (see next page)

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(Date)

Ms. Josephine B. Robinson  
Director  
Office of Community Service  
Administration for Children  
And Families  
U. S. Department of Health  
And Human Services  
370 L'Enfant Promenade, S. W.  
Washington, D. C. 20447

Dear Ms. Robinson:

In accordance with Section 9908(a)(1) of the Community Services Block Grant Act, as most recently amended (42 U.S. C. Section 9901 et seq.), I hereby designate the Department of Housing and Community Development (DHCD) to act as the lead agency for the administration of the Community Services Block Grant. Francena Brooks, Undersecretary of DHCD, is authorized to sign federal assurances and all other documents pertaining to the Community Services Block Grant.

Sincerely,

Deval L. Patrick  
Governor  
Commonwealth of Massachusetts

### III. EXECUTIVE SUMMARY

#### A. CSBG State Legislation

##### Authorizing State Statute

The Massachusetts Economic Opportunity Act of 1984, as amended, M.G.L. c. 23B sec. 24.

Prior to the enactment of Chapter 204 of the Acts of 1996, the Department of Housing and Community Development (DHCD) was known as the Executive Office of Communities and Development. Section 16 of Chapter 19 of the Acts of 2007 changed Director of DHCD to Undersecretary of DHCD.

The Massachusetts State Legislature enacted "The Economic Opportunity Act" for low-income citizens of the Commonwealth of Massachusetts.

Consistent with the Community Services Block Grant Act, [Public Law 97-35, Section 672 et seq. as amended 42 USC. Sec. 9901 et seq.], the Commonwealth of Massachusetts Economic Opportunity Act provides:

- A. A definition of terms used for programs operated by the Commonwealth of Massachusetts, e.g., Community Action Agency, Community Services Block Grant, Density of Poverty . . . ;
- B. A description of the requirements for a community action agency Board of Directors and the qualifications that must be met in order for an organization to be recognized as a community action agency;
- C. A description of the contractual relationship between the state and community action agencies, including the Undersecretary of DHCD, authority to promulgate regulations governing the use of funds, community action agency performance criteria, the de-designation procedure, and the process by which a community action agency may be designated to serve an unserved area;
- D. A description of how Community Services Block Grant funds will be distributed with ninety percent (90%) for community action agencies, five percent (5%) for discretionary Special Projects, and five percent (5%) for the Department's grant administration expenses; and

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- E. A description of the Undersecretary's authority, subject to appropriation, to disburse additional funds, and for community action agencies to obtain funds other than those distributed by the Undersecretary of DHCD.

### **B. Designation of Lead Agency to Administer the CSBG Program**

In accordance with Section 676(a)(1) of the Community Services Block Grant Act, as amended (P.L. 105-285), the Governor of the Commonwealth of Massachusetts has designated the Department of Housing and Community Development (DHCD) as the lead administering agency of the Community Services Block Grant (CSBG) program. Francena Brooks, as the Undersecretary of DHCD, is authorized to sign federal assurances and all other documents pertaining to the CSBG.

The State office to receive the CSBG award notices is:

Massachusetts Department of Housing and Community Development  
100 Cambridge Street, Suite 300  
Boston, MA 02114  
Office: (617) 573-1100  
Fax: (617) 573-1460  
Attention: Francena Brooks, Undersecretary

E-mail: [Tina.Brooks@state.ma.us](mailto:Tina.Brooks@state.ma.us)

The contact person for CSBG program issues is:

Gerald Bell  
Manager, Community Services Programs  
Division of Community Services  
Massachusetts Department of Housing and Community Development  
100 Cambridge Street, Suite 300  
Boston, MA 02114  
Office: (617) 573-1438  
Fax: (617) 573-1460  
E-mail: [Gerald.Bell@state.ma.us](mailto:Gerald.Bell@state.ma.us)

Employer Identification Number: 1-046002284-L3

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### C. Public Hearing Requirements

#### 1. Public Hearing [42 USC 9908 (a) (2) (B)]

DHCD provided written notification (see appendices) to CAAs and other appropriate entities announcing the DHCD's intention to hold a Public Hearing on the proposed FY 2009-2010 CSBG State Plan. Notification of the public hearing date, time and location was posted on DHCD's website.

A Public Hearing on the Plan was convened at 10:00 AM on July 1, 2008 at DHCD, 100 Cambridge Street, 2<sup>nd</sup> Floor, Boston, MA 02114.

Testimony and written comments received were considered in the development of the final CSBG State Plan.

#### 2. Legislative Hearing [42 USC 9908 (a) (3)]

A Legislative Hearing was convened and held at the Massachusetts State House June 3, 2008 (see appendices).

#### 3. Public Inspection of State Plan [42 USC 9908 (e)(2)]

The Department encourages public participation in the development of services and activities covered by this Plan, including the opportunity to review, and/or submit written comments. The draft plan was available for public inspection in July 2008.

In order to facilitate this requirement, the proposed plan was available on the DHCD website.



#### IV. STATEMENT OF FEDERAL AND CSBG ASSURANCES

As part of the annual or bi-annual application and plan required by Section 676 of the Community Services Block Grant Act as amended, 42 U.S.C. 9901 et seq. (The Act), DHCD acting as the lead agency for the administration of the CSBG, hereby agrees to the Assurances in Section 676 of The Act.

##### A. Programmatic Assurances

(1) Funds made available through this grant or allotment will be used:

- (a) To support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families to enable the families and individuals to:
  - (i) remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
  - (ii) secure and retain meaningful employment;
  - (iii) attain an adequate education, with particular attention toward improving literacy skills of low-income families in the communities involved, which may include carrying out family literacy initiatives;
  - (iv) make better use of available income;
  - (v) obtain and maintain adequate housing and a suitable living environment;
  - (vi) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and
  - (vii) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement agencies, which may

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include participation in activities such as neighborhood or community policing efforts;

- (b) To address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and after school child care programs; and
- (c) To make more effective use of, and to coordinate with, other programs (including State welfare reform efforts). [676(b)(1)]
- (2) To describe how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in Section 675C(b) of The Act in accordance with the Community Services Block Grant program, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of the Community Services Block Grant program. [676(b)(2)]
- (3) To provide information provided by eligible entities in the State, including:
  - (a) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under Section 675C(a) of The Act, targeted to low-income individuals and families in communities within the State;
  - (b) a description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations;
  - (c) a description of how funds made available through grants made under Section 675C(a) will be coordinated with other public and private resources; and
  - (d) a description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the Community Services Block Grant, which may include fatherhood initiatives

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and other initiatives with the goal of strengthening families and encouraging effective parenting. [676(b)(3)]

- (4) To ensure that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals. [676(b)(4)]
- (5) That the State and the eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and State and the eligible entities will coordinate the provision of employment and training activities in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998. [676(b)(5)]
- (6) To ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to home energy assistance) are conducted in such communities. [676(b)(6)]
- (7) To permit and cooperate with Federal investigations undertaken in accordance with Section 678D of The Act. [676(b)(7)]
- (8) That any eligible entity in the State that received funding in the previous fiscal year through a Community Services Block Grant under the Community Services Block Grant program will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b) of The Act. [676(b)(8)]
- (9) That the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations. [676(b)(9)]
- (10) To require each eligible entity in the State to establish procedures under which a low-income individual, community organizations, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other

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mechanism) of the eligible entity to petition for adequate representation. [676(b)(10)]

- (11) To secure from each eligible entity in the State, as a condition to receipt of funding, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community--needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs. [676(b)(11)]
- (12) That the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to Section 678E(b) of The Act. [676(b)(12)]
- (13) To provide information describing how the State will carry out these assurances. [676(b)(13)] Please see the Narrative CSBG State Plan below.

### B. Administrative Assurances

The State further agrees to the following, as required under The Act:

- (1) To submit an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the Community Services Block Grant program prepared in accordance with and containing the information described in Section 676 of The Act. [675A(b)]
- (2) To use not less than 90% of the funds made available to the State by the Secretary under Section 675A or 675B of The Act to make grants to eligible entities for the stated purposes of the Community Services Block Grant program and to make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year, subject to the provisions regarding recapture and redistribution of unobligated funds outlined below. [675C(a)(1) and (2)]
- (3) In the event that the State elects to recapture and redistribute funds to an eligible entity through a grant made under Section 675C(a)(1) when unobligated funds exceed 20% of the amount so distributed to such eligible entity for such fiscal year, the State agrees to redistribute recaptured funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to private, nonprofit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the Community Services Block Grant program. [675C(a)(3)].

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- (4) To spend no more than the greater of \$55,000 or 5% of its grant received under Section 675A or the State allotment received under Section 675B for administrative expenses, including monitoring activities. [675C(b)(2)]
- (5) In states with a charity tax credit in effect under state law, the State agrees to comply with the requirements and limitations specified in Section 675C regarding use of funds for statewide activities to provide charity tax credits to qualified charities whose predominant activity is the provision of direct services within the United States to individuals and families whose annual incomes generally do not exceed 185 percent of the poverty line in order to prevent or alleviate poverty among such individuals and families. [675C]
- (6) That the lead agency will hold at least one hearing in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or 675B for the period covered by the State plan. [676(a)(2)(B)]
- (7) That the chief executive officer of the State will designate, an appropriate State agency for purposes of carrying out State Community Services Block Grant program activities. [676(a)(1)]
- (8) To hold at least one legislative hearing every three years in conjunction with the development of the State plan. [676(a)(3)]
- (9) To make available for the public inspection each plan or revised State plan in such a manner as will facilitate review of and comment on the plan. [676(e)(2)]
- (10) To conduct the following reviews of eligible entities:
  - (a) full on-site review of each such entity at least once during each three-year period;
  - (b) an on-site review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the Community Services Block Grant program;
  - (c) follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State; and
  - (d) other reviews as appropriate, including reviews of entities with programs that have had other Federal, State or local grants (other than assistance provided

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under the Community Services Block Grant program) terminated for cause. [678B(a)].

- (11) In the event that the State determines that an eligible entity fails to comply with the terms of an agreement or the State plan, to provide services under the Community Services Block Grant program or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the State will comply with the requirements outlined in Section 678C of The Act, to:
  - (a) inform the entity of the deficiency to be corrected;
  - (b) require the entity to correct the deficiency;
  - (c) offer training and technical assistance as appropriate to help correct the deficiency, and submit to the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate;
  - (d) at the discretion of the State, offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved; and
  - (e) after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding to the eligible entity unless the entity corrects the deficiency. [678(C)(a)]
- (12) To establish fiscal controls, procedures, audits and inspections, as required under Sections 6781D(a)(1) and 678D(a)(2) of The Act.
- (13) To repay to the United States amounts found not to have been expended in accordance with The Act, or the Secretary may offset such amounts against any other amount to which the State is or may become entitled under the Community Services Block Grant program. [678D(a)(3)]
- (14) To participate, by October 1, 2001, and ensure that all-eligible entities in the State participate in the Results-Oriented Management and Accountability (ROMA) System [678E(a)(1)].
- (15) To prepare and submit to the Secretary an annual report on the measured performance of the State and its eligible entities, as described under 678E(a)(2) of The Act.

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- (16) To comply with the prohibition against use of Community Services Block Grant funds for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility, as described in Section 678F(a) of The Act.
- (17) To ensure that programs assisted by Community Services Block Grant funds shall not be carried out in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group, in an election for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election, or any voter registration activity. [678F(b)]
- (18) To ensure that no person shall, on the basis of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with Community Services Block Grant program funds. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 12131 et seq.) shall also apply to any such program or activity. [678F(c)]
- (19) Section 679. Operational Rule

“(a) Religious Organizations Included as Nongovernmental Providers.—For any program carried out by the Federal Government, or by a State or local government under this subtitle, the government shall consider, on the same basis as other non-governmental organizations, religious organizations to provide the assistance under the program, so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment of the Constitution. Neither the Federal Government nor a State or local government receiving funds under this subtitle shall discriminate against an organization that provides assistance under, or applies to provide assistance under, this subtitle, on the basis that the organization has a religious character.

### (b) Religious Character and Independence

1. In General – A religious organization that provides assistance under a program described in subsection (a) shall retain its religious character

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and control over the definition, development, practice and expression of its religious beliefs.

2. Additional Safeguards – Neither the Federal Government nor a State or a local government shall require a religious organization –
  - a. to alter its form of internal governance, except (for purposes of administration of the community services block grant program) as provided in section 676B; or
  - b. to remove religious art, icons, scripture, or other symbols; in order to be eligible to provide assistance under a program described in subsection (a).
3. Employment practices – A religious organization's exemption provided under section 702 of the Civil Rights Act of 1964 (42 U.S.C. 2000e-2) regarding employment practices shall not be affected by its participation in, or receipt of funds from, program described in subsection (a).

### (c) Limitations on Use of Funds for Certain Purposes.---

No funds provided directly to a religious organization to provide assistance under any program described in subsection (a) shall be expended for sectarian worship, instruction, or proselytization.

### (d) Fiscal Accountability.---

- (1) In General.—Except as provided in paragraph (2), any religious organization providing assistance under any program described in subsection (a) shall be subject to the same regulations as other nongovernmental organizations to account in accord with generally accepted accounting principles for the use of such funds provided under such program.
- (2) Limited Audit.—Such organization shall segregate government funds provided under such program into a separate account. Only the government funds shall be subject to audit by the government.

(e) Treatment of Eligible Entities and Other Intermediate Organizations.—If an eligible entity or other organization (referred to in this subsection as an 'intermediate organization'), acting under a contract, or grant or other agreement, with the Federal Government or a State or local government, is given the



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authority under the contract or agreement to select nongovernmental organizations to provide assistance under the programs described in subsection (a), the intermediate organization shall have the same duties under this section as the government."

### C. Other Administrative Certifications

The State also certifies the following:

- (1) To provide assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) shall apply to a recipient of Community Services Block Grant program funds.
- (2) To comply with the requirements of Public Law 103-227, Part C - Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan or loan guarantee. The State further agrees that it shall require the language of this certification to be included in any subawards, which contain provisions for children's services and that all subgrantees shall certify accordingly.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
**Francena Brooks, Undersecretary**  
**Department of Housing and Community Development**

## V. THE NARRATIVE STATE PLAN

### THE NARRATIVE STATE PLAN

#### **(A) Administrative Structure**

##### **(1) State Administrative Agency**

The Executive Office of Housing and Economic Development's Department of Housing and Community Development (DHCD) is the Commonwealth's principal agency for public housing and community development concerns that affect the state's 351 cities and towns. In this role, DHCD utilizes state and federal funds and technical assistance available to strengthen communities and help them plan new developments, encourage economic development, revitalize areas of disinvestment, improve local government management, build and manage public housing, stimulate affordable rental and homeownership through the public/private sector, and respond to the needs of low-income people. DHCD administers the state's public housing programs, coordinates its anti-poverty efforts, allocates federal community development resources, and provides a variety of services to local government officials.

#### **Mission, Goals and Objectives**

The mission of DHCD is to strengthen cities, towns, and neighborhoods to enhance the quality of life of Massachusetts' residents. To accomplish this mission, DHCD will provide leadership, professional assistance, and financial resources to promote safe, decent affordable housing opportunities, economic vitality of communities and sound municipal management. DHCD will forge partnerships with regional and local governments, public agencies, community-based organizations, and the business community to achieve common goals and objectives. In all of these efforts, DHCD will recognize and respect the diverse needs, circumstances, and characteristics of individuals and communities.

Governor Deval Patrick has announced the following key priorities of his administration. CAA programmatic activities, which utilize CSBG funds support the Governor's priorities in the following manner:

#### **World Class Education - Readiness Project is supported by:**

Adult Basic Education (ABE), General Equivalency Diploma (GED) assistance, Head Start and Early Head Start, day care, ESL/ESOL, school drop out prevention, alternative high school and college.

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### **Job Creation and Economic Growth is supported by:**

Workforce development, career counseling, skills training, job placements, Summer Youth Jobs, development for CAA employees, small business development, family self-sufficiency, homeownership opportunities, and community revitalization activities.

### **Civic Engagement and Strong Communities is supported by:**

Individual and family volunteer programs, coalition and partnership building, resident participation, Retired Senior Volunteer Program, community action planning, and emergency assistance.

The Department of Housing and Community Development is committed to:

1. programs and funding that target populations of low- to moderate-incomes and those with special needs;
2. coordinated, integrated and balanced agency responses to address the comprehensive needs and interests of communities;
3. programs and technical assistance designed to facilitate informed decision making at the local level, and to encourage self-sufficiency of residents and communities; and
4. sound business practices that ensure the highest standards of public accountability and responsibility.

### The Office of the Undersecretary

The Undersecretary is appointed by the Governor to administer and maintain executive authority over all phases of DHCD's activities and to coordinate policy with the Governor and the rest of the Administration. The Undersecretary is a member of the Board of Directors (Vice Chairman) of MassHousing (formerly the Massachusetts Housing Finance Agency), the Massachusetts Housing Partnership Fund, and the Community Development Finance Corporation. The Undersecretary is also a member of the Local Government Advisory Council, and is co-chair of the Commonwealth's Economic Assistance Coordinating Committee and the Commission to End Homelessness. The Undersecretary also serves on numerous other state boards and commission, including the Asset Development Commission.

The Office of the Undersecretary includes the Office of the Chief of Staff and the Communications Office. The Undersecretary is also assisted by the Office of the Chief Counsel, Office of Policy Development and the Office of Administration and Finance.

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DHCD is responsible for a variety of programs and services that are administered through three (3) divisions (Division of Community Services, Division of Public Housing and Rental Assistance, and Housing Development). DHCD also includes the Commission of Indian Affairs, the Manufactured Homes Commission, and the American and Canadian/French Cultural Exchange Commission.

In addition, the following quasi-public agencies are affiliates of DHCD: MassHousing; the Community Development Finance Corporation; the Massachusetts Community Economic Development Assistance Corporation, and the Massachusetts Housing Partnership.

### Division of Community Services

This Division is the conduit through which DHCD serves Massachusetts' low-income population. Working in cooperation with the federal government, other state agencies, local and regional nonprofits, and the private sector, the Division is responsible for planning, implementing, and monitoring the delivery of federal and state anti-poverty, neighborhood economic development, homelessness prevention, fuel assistance, and weatherization programs across the Commonwealth. The Division of Community Services (DCS) is organized into five (5) components: the Community Services Unit (CSU), the Community Development Unit (CDU), the Community Assistance Unit (CAU), the Policy and Planning Unit (PPU) and the Fiscal and Compliance Unit (FCU).

The Community Services Unit administers the Community Services Block Grant, the Low-income Home Energy Assistance Program (LIHEAP), the Weatherization Assistance Program (WAP), the Heating Emergency Assistance Retrofit Task Weatherization Assistance Program (HEARTWAP), Individual Development Accounts (IDA), and the Neighborhood Housing Services (NHS) program.

The Community Development Unit is responsible for allocating financial and technical resources to assist cities and towns with their revitalization and community development needs. The Unit uses resources such as Community Development Block Grants, Community Development Action Grant (CDAG) and other state and federal grants, as well as the technical expertise of staff, to support a wide variety of community, housing, and economic development efforts.

The Community Assistance Unit is comprised of a number of programs including Mass Downtown Initiative, Urban Renewal, Urban Center Housing - Tax Increment Financing (UCH-TIF), Smart Growth, 40R, and Relocation. The Community Assistance Unit (CAU) is DHCD's conduit for linking communities with planning and development resources, facilitating its mission to strengthen cities and towns by providing technical assistance and training, and supporting local community development and capacity

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building activities. The CAU's interdisciplinary staff works across programs to enhance service delivery with a focus on housing production, land use and zoning, economic development, sustainable development, and municipal governance in order to help communities effect change and better manage development.

Where possible, DCS attempts to integrate the resources of the Community Development Unit, Community Services Unit, and the Community Assistance Unit.

The Fiscal and Compliance Unit manages all financial, budgeting, and accounting functions of the Division.

The Policy and Planning Unit administers the CSBG Special Projects program and provides policy comments and recommendations on proposed legislation and statutes, by analyzing and ensuring consistency among DCS' goals and DHCD's and the Governor's priorities. In addition, PPU provides recommendations for improving program outcome and performance data and program operations.

### Division of Public Housing and Rental Assistance

The Public Housing and Rental Assistance Division carries out its responsibility for oversight of all state-aided public housing and various rental subsidy programs by partnering with 242 local housing authorities and eight regional non-profit agencies. Through this network, the division maintains a portfolio of over 50,000 units of state-assisted public housing, nearly 19,000 federal rental vouchers and over 7,000 state rental vouchers. These resources provide decent, safe and sanitary affordable homes for over 2% of Massachusetts Residents – low- and moderate-income families, senior citizens and persons with disabilities. While many of these programs may serve households with incomes up to 80% of the area median, this housing generally performs as the safety net for very low-income elderly and family household.

The Division works through three (3) bureaus:

Housing Management, which works with local housing authorities on their day-to-day operations and budgets, and also performs research and advocacy about the needs for sufficient resources and professional management;

Housing Development and Construction, which provides technical assistance and project administration in the areas of design, development and construction with the goal of modernizing the entire portfolio and constructing specialized new public housing units where appropriate;

Rental Assistance carries out the division's role as Massachusetts' largest administrator of the Section 8 rental voucher program and the MRVP and AHVP programs, overseeing

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rental subsidies, upgrading of substandard rental housing and a wide spectrum of support services tied to a rental subsidy.

### Housing Development

This Division supports the production of affordable rental housing, including units for persons with special needs, and the construction or rehabilitation of affordable homes and condominiums for purchase by income-eligible first-time homebuyers. Among the programs that are administered by Housing Development are the Federal Home and Tax Credit programs, Housing Stabilization Fund, HOME, Housing Innovation Fund, Capital Improvement and Preservation Fund, Facilities Consolidation Fund and the Soft Second Program.

### 2. Eligible Entities

The following chart provides lists of eligible entities and geographic areas served (also see appendices for additional information on geographical areas served)

CAA	LOCATION	INDIVIDUALS SERVED	FY 2008 CSBG	TOTAL BUDGET
ABCD	BOSTON	93,592	\$ 5,652,479	\$ 123,519,660
ACTION	GLOUCESTER	3,203	\$ 271,319	\$ 16,710,496
BCAC	PITTSFIELD	15,428	\$ 371,970	\$ 6,190,386
CAAS	SOMERVILLE	1,261	\$ 347,172	\$ 3,711,249
CACCI	HYANNIS	9,865	\$ 338,419	\$ 9,510,085
CAI	HAVERHILL	8,557	\$ 281,530	\$ 11,308,537
CAPIC	CHELSEA	9,153	\$ 297,576	\$ 10,391,982
CEOC	CAMBRIDGE	23,752	\$ 412,812	\$ 1,779,923
CFC	FALL RIVER	30,643	\$ 517,840	\$ 21,254,688
CTI	LOWELL	34,126	\$ 487,208	\$ 51,463,570
CAI	GREENFIELD	25,428	\$ 606,821	\$ 12,531,739
GLCAC	LAWRENCE	21,589	\$ 328,208	\$ 23,385,169
LEO	LYNN	11,949	\$ 423,025	\$ 8,256,769
MOC	FITCHBURG	20,034	\$ 374,887	\$ 16,730,394
NSCAP	PEABODY	14,139	\$ 322,373	\$ 6,549,873
PACE	NEW BEDFORD	31,590	\$ 458,034	\$ 35,371,185
QCAP	QUINCY	17,785	\$ 268,402	\$ 21,096,001
SPCA	SPRINGFIELD	4,980	\$ 495,959	\$ 2,982,379
SHI	BROCKTON	23,510	\$ 436,152	\$ 21,529,667
SMOC	FRAMINGHAM	30,716	\$ 296,117	\$ 55,698,900
SSCAC	PLYMOUTH	18,649	\$ 268,402	\$ 11,936,784
TRI-CAP	MALDEN	13,861	\$ 395,309	\$ 7,228,266
VOC	HOLYOKE	37,013	\$ 332,584	\$ 22,369,717

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WCAC	WORCESTER	23,715	\$ 602,445	\$ 12,963,083
<b>Totals</b>		<b>524,538</b>	<b>\$ 14,587,043</b>	<b>\$ 514,470,502</b>

## 3. Distribution and Allocation of Funds

### (a) Planned Distribution of Funds for Current Fiscal Year

<b>Eligible Entities</b>	<b>Proportional share</b>
1. Action for Boston Community Development, Inc.	38.75%
2. Action, Inc. (Gloucester)	1.86%
3. Berkshire Community Action Council, Inc. (Pittsfield)	2.55%
4. Cambridge Economic Opportunity Committee, Inc. (Cambridge)	2.83%
5. Citizens for Citizens, Inc. (Fall River)	3.55%
6. Community Action Agency of Somerville, Inc. (Somerville)	2.38%
7. Community Action Committee of Cape Cod & Islands, Inc. (Hyannis)	2.32%
8. Community Action, Inc. (Haverhill)	1.93%
9. Community Action of the Franklin, Hampshire and North Quabbin Regions (Greenfield)	4.16%
10. Community Action Programs Inter-City, Inc. (Chelsea)	2.04%
11. Community Teamwork, Inc. (Lowell)	3.34%
12. Greater Lawrence Community Action Council, Inc. (Lawrence)	2.25%
13. Lynn Economic Opportunity, Inc. (Lynn)	2.90%
14. Montachusett Opportunity Council, Inc. (Fitchburg)	2.57%
15. North Shore Community Action Programs, Inc. (Peabody)	2.21%
16. People Acting in Community Endeavors, Inc. (New Bedford)	3.14%
17. Quincy Community Action Programs, Inc. (Quincy)	1.84%
18. Self-Help, Inc. (Brockton)	2.99%
19. South Middlesex Opportunity Council, Inc. (Framingham)	2.03%
20. South Shore Community Action Council, Inc. (Plymouth)	1.84%
21. Springfield Partners for Community Action, Inc. (Springfield)	3.40%
22. Tri-City Community Action Program, Inc. (Malden)	2.71%

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23. Valley Opportunity Council, Inc. (Holyoke)	2.28%
24. Worcester Community Action Council, Inc. (Worcester)	4.13%

### (B) Description of Criteria and Distribution Formula

As outlined in the above table, DHCD shall award at least 90% of the CSBG funds allocated to the Commonwealth of Massachusetts to the 24 private, non-profit eligible entities. DHCD anticipates that the Commonwealth of Massachusetts will receive approximately \$16,207,825 in Community Services Block Grant funding from the U.S. Department of Health and Health Services for FY 2009 - 2010, of which 90%, \$14,587,043 will be awarded to eligible entities based on a historical funding formula.

In the event that the federal CSBG appropriation for FY 2009 and FY 2010 is less than the amount received by the Commonwealth for FY 2008, DHCD shall allocate funding to eligible entities based on the distribution formula used for FY 2008, or in any other manner which is consistent with the requirements of the Community Services Block Grant Act.

Community Services Block Grant funds that are distributed as grants to eligible entities and have not been expended by an entity may be carried over into the next fiscal year for expenditure by the entity for program purposes.

The annual funding and contracting cycle will correspond directly to the timely availability of funds from the U.S. Department of Health and Human Services (HHS).

### (C) Description of Distribution and Use of Restricted Funds.

Community Services Block Grant funds that are distributed as grants to eligible entities and have not been expended by an entity may be carried over into the next fiscal year for expenditure by the entity for program purposes. Each year, DHCD tracks CSBG carry-over funds through the following three mechanisms:

1. During CSBG Annual Application process, carry-over funds from previous fiscal year are identified in the CSBG budget.
2. Carry-over funds are then reprogrammed into CSBG budget and reported accordingly by eligible entities.
3. Carry-over funds are also tracked by the agencies final fiscal report and through audit reports.

### (D) Description of Distribution and Use of Discretionary Funds [42 USC 9908(B)(2)]

The Undersecretary, at her discretion, will distribute five (5%) percent of the FY 2009 and FY 2010 CSBG funds to non-profits for the following purpose(s):



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1. providing training and availability of technical assistance to entities in need;
2. coordinating state-operated programs and services targeted to low-income children and families with services (provided by eligible entities and other funded organizations) to ensure increased access to services provided by such state or local agencies;
3. supporting statewide coordination and communication among eligible entities;
4. analyzing the distribution of funds under the CSBG Act within the state to determine if such funds have been targeted to the areas of greatest need; and
5. supporting innovative programs and activities conducted by community action agencies or other neighborhood-based organizations to eliminate poverty, promote self-sufficiency, and promote community revitalization.

The criteria used to select activities for funding include: (1) activities that closely reflect broader policy objectives of DHCD; (2) services to assist special or unserved populations; (3) diversity in the distribution of resources throughout the Commonwealth of Massachusetts; and 4) other initiatives that expeditiously respond to the needs of low-income people, as determined by DHCD.

For fiscal years 2009 through 2010, DHCD has identified several priority categories in which CSBG Special Projects funding was to be directed. Priority categories identified to date are:

- Economic self-sufficiency,
- Affordable housing and homelessness efforts,
- Increasing the coordination and partnerships between Community Board Organizations (CBOs) and municipal government,
- Targeting funds for direct impact on low-income youth, and
- Community improvement revitalization, and empowerment thru civic engagement.

DHCD shall distribute discretionary fund awards on a rolling basis for projects that addresses specific priority areas. Special Projects categories take into consideration the Governor's priorities of Affordable Housing, Homelessness Prevention, Jobs, Civic Engagement, and Education.

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The Undersecretary, at her discretion, may also provide financial and technical assistance grants to support a variety of anti-poverty and economic development activities that promote family self-sufficiency. As a matter of course, discretionary funds have been awarded to community action agencies, as well as other community based nonprofit agencies, for start-up projects rather than multi-year funding.

Community Services Block Grant Special Projects awards for FY 2009 and 2010 will be announced as the Department approves them.

During fiscal year 2008, DHCD's CSBG discretionary allocation from the U.S. Department of Health and Human Services was \$810,391. During fiscal years 2008 and 2007, using fiscal year 2007 allocation and prior years unexpended funds, DHCD committed a total of \$802,218 in grants, primarily to community action agencies. The following are the lists of grants and their intended purposes:

### Fiscal Year 2007 CSBG Discretionary Awards

Grantees	Purpose	Grant Award
MASSCAP/NIQCA	CAA Self-Assessment and Training/Technical Assistance	\$ 85,000
The Boston Foundation (SSI)	Summer Youth Programs	\$250,000
MACDC	Research and Capacity Building	\$ 65,000
MASSCAP/NIQCA	CAA Self-Assessment and Training/Technical Assistance	\$ 85,000
MASSCAP/Brandeis FLE for Homeless	Family Literacy Education and Training	\$ 67,218
QCAP (CAAPS)	Community Action Access Point Services	\$250,000
Total FY 2007 Awards		\$802,218

### (E) Description of Use of Administrative Funds

DHCD may expend up to 5% of the Community Services Block Grant allocation for administrative expenses and grant management monitoring activities of the Division of Community Services and the Community Services Unit.

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About 70% of the administrative funds will be earmarked for staff salaries and associated fringe benefits. The remaining 30% will be used for other direct administrative expenditures such as office supplies, travel, conferences, and state overhead costs.

### (F) State Community Services Program Implementation

#### Program Overview

As a condition for funding in accordance with the CSBG Act, in FY 2008 each CAA developed and implemented a three (3) year Community Action Plan covering fiscal years 2009 - 2010. CAAs received a comprehensive Action Plan Development Guide containing all the information necessary for the development of each CAA's FY 2009 – 2010 Community Action Plan. Furthermore, a training was held at DHCD for CAA planners to provide an update on the new planning process, including the 12 National Indicators. All 24 eligible entities have submitted their three (3) year Community Action Plan to DHCD.

Each plan includes:

- a description of the service delivery system targeted to low-income families;
- a description of how linkages will be developed to fill identified gaps in services through information, referral, case management, and follow-up consultation;
- a description of how funding under the CSBG Act will be coordinated with other public and private resources; and
- a description of how a local entity will use the funds to support innovative community and neighborhood-based initiatives related to the purpose of the CSBG, which may include fatherhood initiatives and other initiatives with the goal of strengthening family.

In order to ensure that the plan would meet statutory requirements, DHCD set benchmarks that included developing certain strategic goals during the planning process. The first components of the Plan, The Action Planning document and needs assessment rationales described the planning process to be used by CAAs and provided a description of all needs assessment methods and survey instrument(s) to be utilized during the community needs assessment process. The DHCD evaluation process included a two-member review team. DHCD provided extensive technical assistance, both on-site and via the telephone, in the development stage of the plan.

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### Community Needs Assessment

During the three (3) year Community Action Planning process, each eligible entity is required to develop a description of all methods used (e.g., surveys performed, interviews, focus groups, etc.), including a review of secondary data sources. In addition, a description of all needs assessment results, methods of tabulation, and how priority items were identified are to be included in the Community Action Plan.

The goal for the initial phase of a needs assessment is to collect and analyze data that describes each eligible entity's community/service area, the population demographics, and the relevant economic and social conditions. Subsequent analysis of the data produces a set of problem statements for the purpose of addressing those in the future.

During the preliminary phases of the needs assessment process, each CAA tries to address the following:

1. What are the key questions to be answered?
2. Who are the constituencies, neighborhoods or target population(s) that need to be engaged?
3. How many people should be included?

The answers to these questions serve as the framework for needs assessment development.

By using this information, the major issues, problems, and needs within the service area are addressed by CAAs'. In order for the needs assessment to provide an accurate picture of the service area's needs, DHCD encourages random sampling (to the extent possible) of all community residents. Random sampling ensures that every person in a community or group being studied has *an equal chance* of being interviewed or surveyed.

Before distributing survey questionnaires or conducting interviews, eligible entities submit a copy of their survey instrument(s) to the Community Services Unit (CSU) for approval. In addition, a brief Rationale Summary describing the instrument(s) that was chosen, why the particular instrument(s) was chosen, how and why the various questions were formulated etc., are included in the submission.

The three (3) year Community Action Plan was due at DHCD in August 2008, and included the following sections:

- Mission Statement: a brief statement of the CAA's mission (based on the CSBG statute);

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- Community Profile: a description of the CAA's service area and target populations. The profile should be based on the community needs assessment and internal needs assessment results;
- Community Needs Assessment: a description of all methods used (e.g., surveys performed, interviews, focus groups, etc.), including secondary data sources, to determine community priority issues. In addition, a description of all needs assessment results, methods of tabulation, and how priority items were identified should be included in the Community Action Plan;
- Internal Needs Assessment: a description of the method used to identify agency staff and board of directors issues, a listing of results identified through the assessment process, and a description of how issues will be addressed;
- Service Delivery System a description of the CAAs service delivery system (how and through what activities and programs are services delivered to low-income individuals and families in the service area;
- Identification and Evaluation of National Indicators and CSBG National Goals and Outcome Measures: a description of the Outcome Measures (one for each goal) to be used to monitor success in promoting self-sufficiency, community involvement, and increasing and improving the capacity of CAAs. This section should also include a description of the goals and strategies that the CAA plans to adopt for the next three (3) years. Strategy development should include projected program outcomes, the desired impact of the programs and activities delivered, and, strategies for achieving the goals, etc.;
- Linkages: a description of how identified gaps in services will be filled, e.g., through information and referral services, case management, follow-up consultation, advocacy for other local service providers, etc.;
- Funding Strategy: a description of how funding under the CSBG Act will be coordinated with public and private resources and a description of fundraising goals and strategies for the next three (3) years; and
- Vision Statement: a description of anticipated organizational operations and services to clients for the next three (3) years.

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### 3. Tripartite Board Representation

Section 676B(2) of Public Law 105-285, the Community Services Block Grant Act, requires that eligible entities receiving Community Services Block Grant funds comply with the stipulation that boards of directors be constituted so that one-third ( $\frac{1}{3}$ ) of the members are elected public officials or their representatives, and not fewer than one-third ( $\frac{1}{3}$ ) of the members are persons chosen in accordance with the democratic selection procedures adequate to ensure that they are representative of low-income individuals and families in the neighborhood and reside in the neighborhood represented. The remaining one-third ( $\frac{1}{3}$ ) represents officials or members of business, industry, labor, faith-based organizations, law enforcement, education, or other major community groups.

### 4. State Charity Tax Program (Not applicable)

### 5. Programmatic Assurances

The following list shows all CSBG funded programs within applicable program categories on a statewide basis.

SERVICE CATEGORIES	Percent of CSBG funds allocated	Sample Programs
SELF-SUFFICIENCY	4.92%	Family self-sufficiency; case management; and Individual Development Accounts (IDA).
EMPLOYMENT	9.58%	Workforce development; job/career counseling; skills training programs; staff training and development for CAA employees; and job placements.
EDUCATION & LITERACY	14.81%	Adult Basic Education (ABE); General Equivalency Diploma (GED) assistance; Head Start & Early Head Start; child care; day care; educational counseling and guidance; and ESL/ESOL instruction.
INCOME MANAGEMENT	5.29%	Budget/credit/financial counseling; consumer assistance; and Volunteer Income Tax Assistance (VITA); and Earned Income Tax Credit (EITC) assistance.
HOUSING ASSISTANCE	10.83%	1 <sup>st</sup> time homebuyer classes; affordable housing preservation; foreclosure prevention; housing search and placement; and landlord/tenant advocacy.
NUTRITION	6.03%	Food banks and food pantries; nutrition education and counseling; SHARE program; Summer Feeding programs; surplus food/commodities distribution; Women, Infant, and Children (WIC); and holiday food programs.
HEALTH	3.20%	Alcohol and drug abuse prevention; family planning services; primary health care; transportation to medical appointments; and substance abuse treatment.

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EMERGENCY ASSISTANCE	13.53%	Crisis intervention and counseling; Fuel Assistance; emergency heating system repairs; donated goods; homeless shelters; emergency cash assistance; disaster management; and emergency transportation.
SENIOR	2.06%	Projects specifically designed to address the needs of elderly people, such as meals, transportation, telephone assurance, foster grandparents support, intergenerational programs.
YOUTH	6.49%	Summer jobs; youth recreation projects; summer youth employment; school drop-out prevention; homework assistance.
LINKAGES AND COORDINATION	18.89%	Toy giveaway; transportation; community-wide board participation; coalition and partnership building; Community Action Planning; economic development; and resident participation.
OTHER	4.37%	Organizational development and capacity building; board and staff training; planning and information technology.

During the Fiscal Year 2009 – 2010, the CSU shall encourage CAAs to increase the total number of programs implemented under Self-Sufficiency; Income Management; such as Individual Development Account (IDA), financial literacy; and Education and Literacy categories.

### G. Fiscal Controls and Monitoring [42 USC 9914]

#### (1) State Program Monitoring

The Coats Human Services Reauthorization Act of 1998, Sections 676 and 678B, requires DHCD to perform a full onsite review of each CAA at least once during each 3-year period.

DHCD has a comprehensive and in-depth monitoring process in place. The agency has made its monitoring, assessment, oversight, and technical assistance responsibilities high priority tasks within the Division of Community Services (DCS). Consequently, the Community Services Unit (CSU) and Financial and Compliance Unit (FCU) staffs within DCS employ a holistic approach to ensure adequate analysis and coordination of information is reviewed and discussed to support the assessment process. DHCD conducts an in-depth on-site monitoring review of each CAA at least once during each three (3) year period and in accordance with a planned calendar schedule. Agencies deemed "at risk" receive a more frequent in-depth monitoring assessment which often includes increased site visits during a three-year period. Through mutual collaboration of organizations such as the Northeast Institute for Quality Community Action (NIQCA), and Massachusetts Association for Community Action (MASSCAP), DHCD is in close communication with agencies, in order to assure compliance and overall health of the organizations, as well as supporting them with technical assistance in an array of program

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and organizational capacity-building areas. DHCD has been working with agencies since the Government Performance and Results Act (GPRA) passed in 1993 to facilitate CAAs, and to some extent, DHCD's transition from service-based to outcome-based approaches using guidelines available mainly due to the implementation of Results-Oriented Management and Accountability (ROMA) Act in 1998.

DHCD has found that its current monitoring procedures are extremely useful in identifying issues affecting community action agencies. DHCD utilizes a comprehensive in-depth monitoring and assessment tool in order to assure that the network of CAAs meet the highest standards of management and service excellence. The monitoring tool provides a comprehensive assessment protocol not only for its CSBG programs, but also for Community Action as a whole. During the assessment, each CAA's organizational and programmatic capacities are measured and best practice activities are highlighted in the following areas:

- Board Oversight;
- Executive Management;
- Fiscal Oversight and Internal Controls;
- Human Resource Development;
- Program Planning and Implementation, including ROMA;
- Management Information Systems; and
- Outreach.

The three-year Community Action Plan (CAP) and the annual Workplan play a fundamental role in the monitoring process. In order to determine whether a CAA is meeting the goals of the CSBG Act, CSU associates the links between the goals that CAAs establish in their CAPs and in their annual workplan to what is corroborated later in various documents submitted to DHCD (grant applications, program progress reports, and IS Surveys).

DHCD conducts a review and analysis of CSBG-related information in-house throughout the year(s) between the CAP and the on-site in-depth monitoring visit. During the in-house review, DHCD examines workplans, board minutes, progress and financial reports, responses to requests for information, and any other relevant information indicative of the organizational and programmatic health of an agency.

Upon scheduling an on-site monitoring assessment with the CAA, the CSU program representative requests various compliance documents such as bylaws, articles of incorporation, personnel policies, etc. In addition to interviews with key management and program staff, and board members, the on-site monitoring includes a review of CAA administrative files as well as applicable program files. To the extent possible, the in-depth monitoring process combines on-site reviews for CSBG with the Low Income



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Home Energy Assistance Program (LIHEAP). CSU utilizes a team approach in conducting in-depth reviews. The staffs from CSU and FCU perform in-house pre-assessment meetings, on-site monitoring visits, post-monitoring de-briefing meetings and exit conference meetings in concordance with the CSBG monitoring system. In addition, the CSU program representative is required to attend at least one board of directors meeting annually, and generate board meeting monitoring reports which are sent to the community action agency and board chair as part of the on-going monitoring.

In an effort to further enhance monitoring standards, DHCD has increased collaboration efforts with NIQCA and the CAAs in order to meet the highest standards of management and service excellence. DHCD is developing a protocol to incorporate the NIQCA self-assessment as an essential element of an agency's scan of internal strengths and deficiencies. Data from the assessment would be used to develop three (3) year strategic goals related to applicable ROMA goals. Additionally, based on DHCD/CSBG monitoring, NIQCA self-assessments would be required for any CAA identified to be at risk. The integration of NIQCA self-assessment into DHCD monitoring practices allows for maximizing training and technical assistance resources to promote CAA management excellence and service productivity.

### Fiscal Monitoring

The Financial and Compliance Unit (FCU) of the Division of Community Services (DCS) conducts the fiscal monitoring of CAAs on an annual basis. FCU has conducted an annual fiscal review of the CSBG, LIHEAP, WAP, and HEARTWAP programs operated by CAAs. The objective of the review is to ensure that all programs are operated in compliance with applicable State and Federal laws, regulations, contracts, and budgets and to offer training and technical assistance where necessary. In addition, the FCU requires each CAA to submit an agency-wide fiscal report and an annual agency audit. These documents are reviewed for significant findings.

Under the current threshold and risk-based criteria established for the state's single audit, the CSBG program is not considered a "major program" or a "high risk program". However, as part of the single audit, independent auditors review departmental internal control procedures. Internal control procedures are designed to cover the controls existing for all divisions and programs of the department. Thus, the CSBG-established controls come under the purview of the independent auditor of the state's single audit.

In addition to the state's single audit, DHCD mandates that eligible entities of CSBG funds comply with OMB Circular A-133. Each eligible entity receiving CSBG funds submits a single agency-wide audit performed by an independent auditor in conformance with Circular A-133. These audits are reviewed, and where necessary, a Management

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Decision letter is issued by DHCD. The Financial and Compliance Unit follows through resolution on any audit findings reported in the single audit.

Furthermore, at least once every year, fiscal staff performs a fiscal on-site monitoring visit to each sub-recipient agency. These on-site visits are in addition to the in-depth fiscal and program assessment review required under the Coats Human Services Reauthorization Act of 1998, Public Law 105-285.

### DIVISION OF COMMUNITY SERVICES IN-DEPTH MONITORING ASSESSMENT SCHEDULE

YEAR 1 (FY 2008/2009)	YEAR 2 (FY2010/2011)
January – CACCI	October – VOC
February – SPCA	December – CAPIC
April – BCAC; NSCAP	March – GLCAC
May – LEO	April – SSCAC
June - SMOC	May – CAI
December – CAAS	June – ABCD
January – Action	July – PACE
February – CTI	October – MOC*
March – CAI	November – CFC*
April – SHI	December – TRI-CAP*
May – WCAC	
June – QCAP	
July - CEOC	

\* FY 2011

#### 2. Corrective Action Termination or Reduction of Funding [42 USC 9908(b)(8); 42 USC 9915]

The monitoring system strengthens the possibility for corrective action by increasing the opportunities to identify deficiencies in a CAA's programmatic and/or organizational areas. To the extent possible, DHCD utilizes a proactive approach in identifying and addressing programmatic and organizational deficiencies and provides assistance to agencies in implementing measures to avoid crises and stabilize operations where necessary. However, if it is determined that an agency has failed to deliver services and comply with requirements as provided in The Act, DHCD will follow procedures under Section 678 C of The Act.

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DHCD has delineated its termination procedures in Section 29.05 "Corrective Action: Termination and Reduction of Funding" of 760 CMR 29.00 of the Department of Housing and Community Development's Community Services Block Grant Regulations. These procedures are set forth below:

- (1) If the Undersecretary of DHCD determines, on the basis of a final decision in a review pursuant to Section 678B of The Act and 760 CMR 29.09 that an eligible entity fails to comply with the terms of a DHCD funding agreement, or the Consolidated CSBG State Plan to provide services under the CSBG Act or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), DHCD shall:
  - a. inform the entity of the deficiency to be corrected;
  - b. require the entity to correct the deficiency;
  - c. offer training and technical assistance, if appropriate, to help correct the deficiency, and prepare and submit to the Secretary of HHS a report describing the training and technical assistance offered; or if DHCD determines that such training and technical assistance are not appropriate, prepare and submit to the Secretary a report stating the reasons for the determination;
  - d. at the discretion of DHCD (taking into account the seriousness of the deficiency and the time required to correct the deficiency), allow the entity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan to correct such deficiency within a reasonable period of time, as determined by the Undersecretary of DHCD and not later than 30 days after receiving from an eligible entity a proposed quality improvement plan, either approve such proposed plan or specify the reasons why the proposed plan cannot be approved; and
  - e. after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding of the eligible entity unless the entity corrects the deficiency.
- (2) A determination to terminate the designation or reduce the funding of an eligible entity is reviewable by the Secretary in accordance with The Act.
- (3) The procedures set forth in 760 CMR 29.05 are intended to be carried out

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consistent with the protections and procedures provided in the CSBG Act; as it may be amended, and any applicable federal regulations. In the case of a conflict, the federal requirements shall prevail.

- (4) A community action agency (CAA) or other eligible entity will not have its present or future funding terminated and DHCD will not de-designate a CAA or other eligible entity until Section 678C of The Act procedures are followed and a review by the Secretary of HHS is completed pursuant to Section 678C(B) of The Act. Nor will it have its funding reduced below the proportional share of funding it received the previous fiscal year, except in accordance with the requirements of The Act.

As part of the monitoring process, the CAA is provided a draft report for review and comment. CAAs are provided information on how they are meeting the CSBG assurances. The CAA is given a period of time to provide a written response to the monitoring report. Training will be provided in combination with the onsite compliance monitoring. Monitoring of subgrantee agencies will emphasize the identification of training needs as well as compliance with federal and state regulations. Training will be provided both on-site during monitoring and in follow-up sessions. If further action is needed, DHCD will form a Steering Committee comprised of DHCD, MASSCAP, and grantee representatives. The Steering Committee may convene regular meetings concerning the oversight and status of recommendation tasks.

DHCD believes this approach eliminates any interruption of services to communities, and avoids increasing any negative public perceptions.

### (3) Fiscal Controls, Audits, and Withholding

- (a) The assurance at Section 676 (b) (7): the State will permit and cooperate with Federal investigations undertaken in accordance with section 676D of The Act.
- (b) The assurance at Section 676 (b) (8): A CAA or other eligible entity will not have its present or future funding terminated and DHCD will not de-designate a CAA or other eligible entity until Section 678C procedures of The Act are followed and reviewed by the Secretary of HHS is completed pursuant to Section 678C(B) of The Act. Nor will it have its funding reduced below the proportional share of funding it received the previous fiscal year, except in accordance with the requirements of The Act.
- (c) Petitioning for Adequate Representation: 42 USC 9908 (b)(10) and 760 CMR : Section 29.06 (4) require that the by-laws of a CAA or other eligible entity include

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a description of procedures for selecting new board members in case of a vacancy on the board.

### H. ACCOUNTABILITY AND REPORTING REQUIREMENTS

#### (1) RESULTS ORIENTED MANAGEMENT AND ACCOUNTABILITY SYSTEM (ROMA) IMPLEMENTATION, 42 USC 9908 (b)(12); 42 USC 9917.

Since 1999, the implementation of ROMA in Massachusetts has been part of a continuous improvement plan. In fact, certain aspects of current ROMA implementation, i.e., CAA information technology capacity building, go back to 1994 when DHCD began utilizing Massachusetts' discretionary funds to provide CAAs with the opportunity to develop computerized client demographic databases. At present, CAAs track and report unduplicated client demographic characteristics and many are well on their way to updating their automated client tracking and reporting systems to include the outcome reporting process including the development of common program outcomes by DHCD and MASSCAP IT Committee.

DHCD recently implemented a ROMA onsite training program involving several eligible entity staff and board members. The following eligible entities have recently completed their onsite ROMA staff and/or board training:

- Community Action Agency of Somerville, Inc.
- Community Action, Inc.
- Community Action Committee of Cape Cod and the Islands, Inc.
- Community Teamwork, Inc.
- Greater Lawrence Community Action Council, Inc.
- North Shore Community Action Programs, Inc.
- People Acting in Community Endeavor, Inc.
- South Middlesex Opportunity Council, Inc.
- Springfield Partners for Community Action, Inc.
- Berkshire Community Action Council, Inc.
- Lynn Economic Opportunity Council, Inc.
- Valley Opportunity Council, Inc.

During 2007, a series of ROMA and Community Action Planning-related trainings were held at DHCD. These training sessions were designed to assist and exchange strategies with CAA planners and executive directors.

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July 2007: ROMA National Indicators Training for CAA Planners – the following topics were presented:

### Overview – CAA Common Programs

#### Outcome Targeting

- Massachusetts & ROMA
- National Indicators Reported
- Feedback from NASCSP

### Verification & Monitoring of Outcomes

#### Community Action Planning

- Plan for Planning, Community Needs Assessment Instruments, and Rationale Summary
- Community and Internal Needs Assessment
- Service Delivery System
- National Indicators and Three-Year Goal and Strategies
- Linkage Strategies
- Funding Strategies
- Vision Statement

December 2007: A two-day training was held at DHCD for CAA planners and executive directors. The following topics were presented:

#### Day 1: Community Action Planning

- DHCD Community Action Planning Guide
- CAA Mission and Vision
- Community & Internal Needs Assessment
- Service Delivery Strategies
- ROMA for Boards
- Executive Involvement in Planning & DHCD Priorities/Initiatives
- Developing Strategies and Objectives
- CAA Best Practice Examples

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### Day 2: ROMA Review Session

- ROMA and the 12 National Indicators
- Tracking, Verifying, & Reporting Outcomes

During fiscal years 2009 - 2010, DHCD will continue its on-going effort of ROMA implementation in the following additional areas:

- Improve the current process for CAAs to identify, select, plan, and report on the new National Performance Indicators using DHCD's current planning and reporting avenues such as, Community Action Plan; CSBG Annual Application; Semi-Annual and Annual Program Progress Reports; and the CSBG Information System Survey.
- Continue to upgrade and enhance the existing DHCD-CAA E-Government network to allow online reporting of the National Performance Indicators.
- Offer training for DHCD staff on National Indicators and the DHCD-CAA E-Government Network project.

### The National Indicators of Community Action Performance

CAAs in Massachusetts have adopted and have been reporting on the 12 National Indicators since Fiscal Year 2005. Furthermore DHCD has developed a master list of CAA programs that *crosswalk* their programs with the 12 National Indicators. A common program indicator list has been developed jointly with MASSCAP; the list will be used during the FY 2009 - 2010 CSBG Annual Application processes.

### Goal 1: Low-Income People Become More Self-Sufficient

#### National Performance Indicator 1.1 – Employment

The number and percentage of low-income participants in community action employment initiatives who get a job or become self-employed as measured by one or more of the following:

- A. Unemployed and obtained a job.
- B. Employed and obtained an increase in employment income.
- C. Achieved "living wage" employment and benefits.

#### National Performance Indicator 1.2 – Employment Supports

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The number of low-income participants for whom barriers to initial or continuous employment are reduced or eliminated through assistance from community action as measured by one or more of the following:

- A. Obtained pre-employment skills/competencies required for employment and received training program certificate or diploma.
- B. Completed ABE/GED and received certificate or diploma.
- C. Completed post-secondary education program and obtained certificate or diploma.
- D. Enrolled children in "before" or "after" school programs in order to acquire or maintain employment.
- E. Obtained care for child or other dependant in order to gain or maintain employment.
- F. Obtained access to reliable transportation and/or driver's license in order to gain or maintain employment.
- G. Obtained health care services for themselves or a family member in support of family stability needed to gain or retain employment.
- H. Obtained safe and stable housing in support of family stability needed to gain or retain employment.
- I. Obtained food assistance in support of family stability needed to gain or retain employment.

### National Performance Indicator 1.3 – Economic Asset Enhancement and Utilization

The number and percentage of low-income households that achieve an increase in financial assets and/or financial skills as a result of community action assistance, and the aggregated amount of those assets and resources for all participants achieving the outcome, as measured by one or more of the following:

#### A. Enhancement –

Number and percent of participants in tax preparation programs who identify any type of Federal or State tax credit and the aggregated dollar amount of credits.

Number and percentage obtained court-ordered child support payments and the expected annual aggregated dollar amount of payments.

Number and percentage enrolled in telephone lifeline and/or energy discounts with the assistance of the agency and the expected aggregated dollar amount of savings.

#### B. Utilization –

1. Number and percent demonstrating ability to complete and maintain a budget for over 90 days.



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2. Number and percent opening an Individual Development Account (IDA) or other savings account and increased savings, and the aggregated amount of savings.
3. Of participants in a community action asset development program (IDA and others):
  - a. Number and percent capitalizing a small business with accumulated savings.
  - b. Number and percent pursuing post-secondary education with accumulated savings.
  - c. Number and percent purchasing a home with accumulated savings.

### **Goal 2: The Conditions in Which Low-Income People's Lives are improved**

#### National Performance Indicator 2.1 Community Improvement and Revitalization

Increase in, or safeguarding of threatened opportunities and community resources or services for low-income people in the community as a result of community action projects/initiatives or advocacy with other public and private agencies, as measured by one or more of the following:

- A. Accessible "living wage" jobs created or saved from reduction or elimination in the community.
- B. Safe and affordable housing units created in the community.
- C. Safe and affordable housing units in the community preserved or improved through construction, weatherization or rehabilitation achieved by community action activity or advocacy.
- D. Accessible and affordable health care services/facilities for low-income people created or saved from reduction or elimination.
- E. Accessible safe and affordable childcare or child development placement opportunities for low-income families created or saved from reduction or elimination.
- F. Accessible "before" school and "after" school program placement opportunities for low-income families created or saved from reduction or elimination.
- G. Accessible new, preserved, or expanded transportation resources, or those that are saved from reduction or elimination, that are available to low-income people, including public or private transportation.
- H. Accessible or increased educational and training placement opportunities, or those that are saved from reduction or elimination, that are available for low-income people in the community, including vocational, literacy, and life skill training, ABE/GED, and post-secondary education.

#### National Performance Indicator 2.2 -- Community Quality of Life and Assets

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The quality of life and assets in low-income neighborhoods are improved by community action initiative or advocacy, as measured by one or more of the following:

- A. Increases in community assets as a result of a change in law, regulation or policy, which results in improvements in quality of life and assets.
- B. Increase in the availability or preservation of community facilities.
- C. Increase in the availability or preservation of community services to improve public health and safety.
- D. Increase in the availability or preservation of commercial services within low-income neighborhoods.
- E. Increase or preservation of neighborhood quality of life resources.

### **Goal 3: Low-Income People Own a Stake in Their Community**

#### National Performance Indicator 3.1 – Civic Involvement

The number of volunteer hours donated to community action.

#### National Performance Indicator 3.2 – Community Empowerment through Maximum Feasible Participation

The number of low-income people mobilized as a direct result of community action initiative to engage in activities that support and promote their own well-being and that of their community as measured by one or more of the following:

- A. Number of low-income people participating in formal community organizations, government, boards or councils that provide input to decision-making and policy setting through community action efforts.
- B. Number of low-income people acquiring businesses in their community as a result of community action assistance.
- C. Number of low-income people purchasing their own homes in their community as a result of community action assistance.
- D. Number of low-income people engaged in non-governance community activities or groups created or supported by community action.

### **Goal 4: Partnerships Among Supporters and Providers of Service to Low-Income People are Achieved**

#### National Performance Indicator 4.1 – Expanding Opportunities through Community-Wide Partnerships

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The number of organizations, both public and private, community action actively works with to expand resources and opportunities in order to achieve family and community outcomes.

Number of organizations community action agencies work with to promote family and community outcomes.

### **Goal 5: Agencies Increase Their Capacity to Achieve Results**

#### **National Performance Indicator 5.1 – Broadening the Resource Base**

The number of dollars mobilized by community action, including amounts and percentages from:

- Community Services Block Grant (CSBG);
- Non-CSBG Federal Programs;
- State Programs;
- Local Public Funding;
- Private Sources (including foundations and individual contributors, goods and services donated); and
- Value (at Federal minimum wage) of volunteer time.

### **Goal 6: Low-Income People, Especially Vulnerable Populations, Achieve Their Potential by Strengthening Family and Other Supportive Systems**

#### **National Performance Indicator 6.1 – Independent Living**

The number of vulnerable individuals receiving services from community action that maintain an independent living situation as a result of those services:

- A. Senior Citizens.
- B. Individuals with Disabilities.

#### **National Performance Indicator 6.2 – Emergency Assistance**

The number of low-income individuals or families served by community action that sought emergency assistance and the percentage of those households for which assistance was provided, including such services as:

- A. Food (specify unit of measurement – individuals, families, and packages/bags);
- B. Emergency vendor payments, including fuel/energy bills;
- C. Temporary Shelter;

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- D. Emergency Medical Care;
- E. Protection from Violence;
- F. Legal Assistance;
- G. Transportation;
- H. Disaster Relief; and
- I. Clothing.

### National Performance Indicator 6.3 – Child and Family Development

The number and percentage of all infants, children, youth, parents, and other adults participating in developmental or enrichment programs that achieve program goals, as measured by one or more of the following:

#### A. Infants and Children –

1. Infants and children obtain age appropriate immunizations, medical, and dental care.
2. Infant and child health and physical development are improved as a result of adequate nutrition.
3. Children participate in pre-school activities to develop school readiness skills.
4. Children who participate in pre-school activities are developmentally ready to enter Kindergarten or 1<sup>st</sup> Grade.

#### B. Youth –

1. Youth improve physical health and development;
2. Youth improve social/emotional development;
3. Youth avoid risk-taking behavior for a defined period of time;
4. Youth have reduced involvement with criminal justice system; and
5. Youth increase academic, athletic or social skills for school success by participating in before or after school programs.

#### C. Parents and Other Adults –

1. Parents and other adults learn and exhibit improved parenting skills; and
2. Parents and other adults learn and exhibit improved family functioning skills.

### Future Direction

#### (1) Individual Development Account (IDA)

The Massachusetts IDA program was initiated with an FY 2007 state appropriation of \$500,000 for the establishment of a one-year, pilot Individual Development Account (IDA) Program. DHCD was charged with the responsibility for the initiative; this

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responsibility included, but was not limited to: participation in an Asset Development Commission, drafting and issuing program guidelines, issuing the Notice of Funding Availability (NOFA), making funding decisions, handling program and fiscal monitoring and oversight. The FY 2007 and 2008 programs are successfully underway. No contracts will be awarded for the FY 2009 IDA initiative, until the Massachusetts FY 2009 General Appropriation Act, which includes provision of funding for this IDA initiative is signed into law.

Individual Development Account (IDA) programs are an innovative anti-poverty tool that can enable the State and community-based nonprofits to implement and demonstrate an asset-based approach to helping low-income families and individuals break the cycle of poverty. IDAs are dedicated matched savings accounts that are used to acquire greater economic independence and purchase a particular asset. Every dollar in savings is matched at a set rate by the local Program Grantee. The IDA mechanism promotes savings and enables participants to acquire a lasting asset after saving for a few years. When combined with financial literacy education and program support services, IDAs offer powerful opportunities to change lives and contribute to greater economic independence.

Persons currently residing in state-aided housing have been identified as a critical group in need and therefore shall receive preference for enrollment in the program. IDAs provide a unique opportunity to complement and support low-income persons achieve this goal.

The Governor's budget language for the Individual Development Account Program is as follows:

*For the Individual Development Account (IDA) program; provided, that households residing in state-subsidized housing, as defined by the department, shall receive preference for enrollment in the program; provided further, that funds may be awarded to community-based organizations to establish or support local IDA programs; provided further, that funds may be used for administrative costs to operate an IDA program for financial literacy and asset-specific training and as a match for program participant savings for qualified acquisition costs with respect to a qualified principal residence for a qualified first-time homebuyer, as defined by the department; provided further, that the department may determine other qualified match uses consistent with the guidelines established in federal IDA guidelines under 42 USC 604; and provided further, that funds may be used to secure federal asset building programs*

(2) Financial Literacy

MASSCAP, in partnership with Brandeis University's Institute on Assets and Social Policy (IASP), is developing a Financial Literacy Education (FLE) curriculum that can be delivered by CAAs and other community based organizations to assist homeless or near homeless individuals and families as they strive toward long-term economic self-sufficiency. DHCD has allocated a total of \$67,216.00 in CSBG Special project funds to MASSCAP to develop and implement an FLE model at 2-3 pilot CAA sites. FLE programs can help persons/families to maximize limited resources, manage debt, correct credit problems, increase access to housing subsidies and affordable housing – key components in a comprehensive strategy to achieve housing and economic security and prevent homelessness. Successful FLE programs must be tailored to clients' particular needs/experiences and must connect clients with real financial opportunities. It is estimated that once the FLE curriculum is rolled out, more than 2000 homeless individuals will benefit annually. The strategies outlined for the MASSCAP FLE design support the findings of the Massachusetts Commission to End Homelessness – development of an FLE curriculum is among the recommendations for asset development priorities.

(3) Community Action Access Points (CAAPS)

Three CAAs in partnership with MASSCAP have developed a pilot proposal to develop a more intensive case management system that would assist low-income persons/families to move along a continuum towards economic self-sufficiency. Through the Community Action Access Points (CAAPS), the participating CAAs will respond to client needs in an individualized and comprehensive manner that stabilizes households, and for those that are ready, to move towards self-sufficiency. CAAPS is a proposed client-focused system that is being designed to serve clients at all points of entry, utilizing a standard intake and assessment tool/process. Key to the success of this initiative are standardized intake and assessment procedures that evaluate clients based on their needs and strengths and connects them to all services for which they are eligible, no matter what door they use to enter the CAA. The project involves extensive redesign of CAA procedures and systems, including an integral IT system change, as well as significant changes in staff function and organizational culture. DHCD has allocated a total of \$250,000 CSBG Special Projects funds to 3 CAAs for this project. The funding will support oversight and coordination of this initiative, the development of a comprehensive intake and assessment tool, and staff development and training. As a result of CAAPS, 6000 households will be pre-assessed and provided with internal and external referrals, and of those, 1200 will be enrolled in intensive case management services.

#### (4) The Boston Foundation

In partnership with DHCD, The Boston Foundation is developing safe, year-round opportunities for teens and high-risk youth. This comprehensive, collaborative and neighborhood-based Public Safety Strategy utilizes proven and effective “best practices” to combat escalating violence in Boston’s hardest-hit neighborhoods. Neighborhood based teams with “anchor” institutions will provide coordinated summer and year-round extended-hours programming in communities with the highest need – particularly youth living in high crime areas and public housing where high numbers of youth are concentrated. Key elements of this year-round strategy include: 1) extended hours programming targeted to the City’s highest risk youth; 2) expanded numbers of street outreach workers serving and connecting youth to services during high crime periods; and 3) strengthened training and outreach methods for youth workers and street outreach workers. DHCD will support this very important initiative with \$250,000 in FY 2008 CSBG Special Projects funding.

#### Information Technology

DHCD has mandated electronic transfer of data with the following two goals in mind: (1) accountability and data verification; and (2) process automation and paperless transactions.

This new process of collecting data from CAAs has greatly improved DHCD’s data analysis and reporting capacity; with a hope that future enhancements to this system will further improve reporting and verification of CAA data. During fiscal year 2009 and 2010, DHCD will implement the following ongoing goals:

- To further improve the DHCD – CAA E-Government Network to allow seamless online submission of CSBG Annual Application, Semi-Annual and Annual Program Progress Reports, and the year-end CSBG Information System Survey;
- To encourage the use of existing Information Technology at the local levels to further automate the use of the 12 National Indicators for planning and reporting;
- To provide CAAs with application training and technical assistance consistent with the existing system and all upgrades and enhancements; and
- To continue to provide in-house training for DHCD staff to be better able to understand changes in the DHCD – CAA E-Government Network.

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### COORDINATION AND LEVERAGING OF OTHER FUNDING AT STATE LEVEL [42 USC 9908 (b)(5); 42 USC 9908 (b)(6); 42 USC 9908 (b)(9)]

1. DHCD ensures coordination, linkage, and partnership between the CSBG program and other entities by active participation on numerous boards, including, but not limited to the State Mental Health Planning Council, Commonwealth Coordinating Committee to: Support Families, Schools, and Community Collaboration. DHCD is also seated on the three regional boards of the Emergency Food and Shelter Program operated by the United Way and the MASSCAP Information Technology Committee. In addition, DHCD has a sound relationship with MASSCAP, the state association representing CSBG grantees. Meetings are often coordinated between MASSCAP and various DHCD representatives so that information may be shared concerning a variety of issues concerning low-income individuals.
2. The Massachusetts Executive Office of Labor and Workforce Development (EOLWD) serves as the agency responsible for implementing the Workforce Investment Act (WIA). To assure collaboration by the many partnering agencies included in The Act, in the fall of 1998 EOLWD convened a group of state workforce development agencies to begin discussions focused on implementing WIA in Massachusetts. Although DHCD did not actively participate in the development of the Massachusetts Unified State Plan, DHCD reviewed the draft plan and met on a number of occasions with representatives of EOLWD. DHCD also met with MASSCAP to discuss their ongoing role in participating on a number of the nine sub-committees created to address a range of issues effecting the implementation of WIA. Also, a MASSCAP representative has been appointed to the State Workforce Investment Board. Massachusetts is integrating and coordinating its workforce development system. In Massachusetts - and nationally - the limited engagement between Community Action Agencies and state and regional workforce development systems represents a major lost opportunity in the creation of an effective self-sufficiency continuum. While many Community Action Agencies across the country provide leading-edge programs in worker education and training, in too many localities the CAA network is not systematically or fully integrated with the institutions and services established through the Federal Workforce Investment Act. In some respects, the relationship between these entities mirrors the larger obstacles and opportunities nationally. DHCD will continue to work to ensure greater participation and coordination of CSBG programs in the areas of work force development.
3. DHCD shall make every effort to identify other available state funding sources for the community services network.



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### ADMINISTRATIVE CERTIFICATIONS

#### Certification Regarding Environmental Tobacco Smoke

In accordance with the Public Law 103-227, Part C. Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994 (Act), DHCD shall require that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by Federal programs either directly or through States or local governmental by Federal grant, contract, loan or loan guarantee.

#### Certification Regarding Lobbying

No federal appropriated funds have been paid or will be paid by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representative of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31 U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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### Statement for Loan Guarantees and Loan Insurance:

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form LLL "Disclosure Forms to Report Lobbying," in accordance with its instructions.

### Certification Regarding Debarment, Suspension, and Other Responsibility Matters Primary Covered Transactions

The Commonwealth of Massachusetts, by signing and submitting this CSBG State Plan and Application, certifies to the federal government that it agrees to comply with the assurances set out below:

- (a) The inability of a person to provide the certification required below will not necessarily result in denial of participation in the covered transaction. If necessary, the Commonwealth of Massachusetts shall submit an explanation of why it cannot provide the certification. The certification or explanation will be considered in connection with HHS's determination whether to enter into the transaction. However, a failure of the Commonwealth of Massachusetts to furnish a certification or explanation shall disqualify such person from participation in the transaction.
- (b) The certification in this clause is a material representation of fact upon which reliance was placed when HHS determined that the Commonwealth of Massachusetts knowingly rendered an erroneous certification, in addition to other remedies available to federal government, HHS may terminate this transaction for cause or default.
- (c) The Commonwealth of Massachusetts shall provide immediate written notice to the HHS agency to which this Plan is submitted if at any time the Commonwealth of Massachusetts learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
- (d) The terms "covered transaction," "debarred," "suspended," "ineligible," "person," "primary covered transaction," "principal," "proposal," and "voluntarily excluded," as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549 at 45 CFR Part 76.

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- (e) The Commonwealth of Massachusetts agrees by submitting this Plan that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by HHS.
- (f) The Commonwealth of Massachusetts further agrees by submitting this Plan that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered Transactions," provided by HHS without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- (g) A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the Non-procurement List (of excluded parties).
- (h) Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
- (i) Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the federal government, HHS may terminate this transaction for cause or default.
- (1) The Commonwealth of Massachusetts certifies to the best of its knowledge and belief, that it and its principals:
  - (a) are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency;
  - (b) have not within a 3-year period preceding this Plan been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state or local) transaction or contract under public transaction; violation of federal or state antitrust statutes or commission of

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embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

- (c) are not presently indicted or otherwise criminally or civilly charged by a governmental entity (federal, state or local) with commission of any of the offenses enumerated in paragraph (1) (b) of this certification; and
  - (d) have not within a 3-year period preceding this Plan had one or more public transactions (federal, state or local) terminated for cause or default.
- (2) Where the Commonwealth of Massachusetts is unable to certify to any of the statements in this certification, the Commonwealth of Massachusetts shall attach an explanation to this Plan.

### Drug-Free Workplace Act Certification

The Commonwealth of Massachusetts, by submitting this CSBG State Plan and Application, is providing the certification set out below which requires, by regulations, the implementation of the Drug-Free Workplace Act of 1988, 45 CFR Par 76, Subpart F. The regulations, published in the May 25, 1990 Federal Register, require certification by grantees that they will maintain a drug-free workplace. The certification set out below is a material of fact upon which reliance will be placed when the U.S. Department of Health and Human Services (HHS) determines to award the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirement of the Drug-Free Workplace Act, HHS, in addition to any other remedies available to the federal government, may take action authorized under the Drug-Free Workplace Act. False certifications shall be grounds for suspension of payments, suspension or termination of grants, or government-wide suspension or debarment.

Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, once workplaces are identified, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.

Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or state highway department while in operation, state employees in each local unemployment office, performers in concerts hall or radio studios).

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If the workplace identified to HHS changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in questions (see above).

Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedule I through V of the Controlled Substance Act (21 USC. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15).

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug statutes;

"Criminal drug statute" means a Federal or non-federal or state criminal drug statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients of subcontractors in covered workplaces).

The Commonwealth of Massachusetts certifies that it will or will continue to provide a drug-free workplace by:

- (a) publishing a statement notifying employees that the unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying that actions that will be taken against employees for violation of such prohibition;
- (b) establishing an on-going drug-free awareness program to inform grantees about:
  - (1) the dangers of drug abuse in the workplace;
  - (2) the state's policy for maintaining a drug-free workplace;

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- (3) any available drug counseling, rehabilitation, and employee assistance programs; and
- (4) the penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) making it a requirement that employees to be engaged in the performance of the grant be given a copy of the statement required by subparagraph (a);
- (d) notifying the employee and grantee in the statement required by subparagraph (a) that, as a condition of employment under the grant, the employee will:
  - (1) abide by the terms of the statement; and
  - (2) notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five (5) calendar days after such conviction;
- (e) notifying the agency in writing, within ten (10) calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- (f) taking one of the following actions within thirty (30) calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is convicted:
  - (1) taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - (2) requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement, or other appropriate agency;

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(g) making a good faith effort to continue to maintain a drug-free workplace through the implementation of paragraphs (a), (b), (c), (d), (e), and (f).

Signature

\_\_\_\_\_  
Francena Brooks, Undersecretary, DHCD

Date: \_\_\_\_\_

Grant Number: \_\_\_\_\_

## FISCAL YEAR 2009 – 2010 CSBG STATE PLAN

### (2) ANNUAL REPORT

A copy of the Fiscal Year 2007 CSBG Information System Survey Report was submitted to the National Association for State Community Services Programs (NASCSPP) within the established deadline of March 31, 2008 for purpose of reporting to the U.S. Dept. of Health and Human Services. Reports for the upcoming fiscal years will be submitted within the deadline as well.

Each year, DHCD also publishes a CSBG Performance Report, highlighting information presented in the Information System Survey. The report usually includes:

- DHCD's organizational and program profiles.
- A report on the implementation of Results Oriented Management and Accountability (ROMA) in Massachusetts, including training and technical assistance initiatives.
- Quantitative analyses of clients served in Massachusetts including the total number of clients served statewide, breakout of number of clients served by service category, and demographic characteristics of clients such as, gender, age, race, education, family structure, income sources, income level, and housing status.
- A report on the National Indicators.
- Anecdotal evidence of clients achieving self-sufficiency and innovative programs.
- CAA coordination of CSBG funding from other federal and non-federal sources.
- An accounting of funds received through CSBG and other federal and non-federal sources.

### VI. APPENDICES

- State Legislation - The Massachusetts Economic Opportunity Act of 1984
- 760 CMR 29.00 DHCD/CSBG Regulations
- Department of Housing and Community Development - Organizational Structure
- CAA Address List
- Notice of DHCD FY 2009 and 2010 CSBG Public Hearing

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